

E-01933A-14-0248



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ARIZONA CORPORATION COMMISSION  
UTILITY COMPLAINT FORM

Investigator: Carmen Madrid

Phone: NOV -3 A 10: 06

Fax:

Priority: Respond Within Five Days

ARIZONA CORPORATION COMMISSION  
DOCKET CONTROL

Opinion No. 2014 - 119490

Date: 10/31/2014

Complaint Description: 19S Solar  
08E Rate Cases Items - In Favor

ORIGINAL

First:

Last:

Complaint By: Bruce

Plenk

Account Name: Bruce Plenk

Home:

Street:

Work: (000) 000-0000

City: Tucson

CBR:

State: AZ Zip: 85712

is: E-Mail

Utility Company: Tucson Electric Power Company

Division: Electric

Contact Name:

Contact Phone:

Nature of Complaint:

From: Util-PublicComment  
Sent: Thursday, October 30, 2014 4:58 PM  
To: Util-PublicComment  
Cc:  
Subject: Public Comment

Name: Bruce Plenk

Date: 10/30/14

Address:

Phone:

CityStateZip: Tucson, AZ 85712

Cell:

Docket: IN the Matter of TEP's 2015 REST Plan

DocketNo: 14-0248

Utility: TEP

Position: Pro

Email:

Arizona Corporation Commission

DOCKETED

NOV 3 2014

DOCKETED BY

Comments: Chairman Stump and Commissioners: Please accept these comments on the proposed TEP 2015 REST plan.

1- Bright Tucson Solar Buildout Plan. I support the ending of REST funds to finance these projects. They are more appropriately included in normal ratemaking categories and returns calculated using approved rate case methodology.

2- Energy Storage Solicitation. I support TEP's efforts to review and evaluate energy storage for renewable resources. This is clearly one of, if not, the biggest issue going forward with renewable energy and should be a part of TEP's portfolio. Both research and development of the best storage options as well as guidance regarding

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financial treatment of the expenses for future storage facilities should be clarified as soon as possible. TEP should be encouraged to move ahead rapidly with their proposed storage solicitation.

3- TEP-owned DG Program. I support TEP's proposal but believe that a number of clarifications are necessary to make this program successful and truly in the interest of all ratepayers and the Tucson community.

- First, the program must support the local solar installer community by utilizing qualified local installers, several of them for installation and ongoing maintenance. Reasonable qualifications should include NABCEP certification, previous successful TEP-area installations, participation in installer education programs (such as SASSB and the like), community involvement, etc.

- Secondly, the program should focus on bringing in customers who would otherwise not participate in solar through purchasing or leasing. This means directing the program to customers with low credit scores particularly and providing support if necessary to assure payments and flexibility or waiver of the \$250 processing fee. Customers in areas where TEP sees a need to develop additional resources to support their system should be prioritized. Customers with west-facing roofs who have not installed solar might be one new group to focus on, as TEP has indicated an interest in adding late-day PV production to its grid to meet peak load.

- Third, all TEP customers should be kept fully aware of this new program by clear information on the TEP website to allow evaluation, comments, and improvements as the program unfolds.

- Fourth, to allow customers to make long term decisions about solar, the implications for home sales of these systems must be fully disclosed as well as any opportunities to upgrade, remove or purchase the system once installed. Similarly, more detail is needed regarding the interplay between the installation of the PV system and future energy efficient improvements or EV installation.

4- The Company should continue to provide meters for solar installations.

5- The Commission should require TEP to keep the Arizona Goes Solar website current and provide complete information. If this requires specific funding, I would support that as part of the REST plan. Now their pages are 2-3 years out of date and it is impossible to locate any useful information. Please devise a plan to encourage/require TEP to timely submit their data and post it in a way that the public can see where things stand at any point in time. Even better would be a revision of the website so the public can search the entire data base by installer, system size, etc to be able to keep up with trends and prices as well as a "shorthand summary" of current installations in each category.

Thank you for the opportunity to comment on this plan.

\*End of Complaint\*

### Utilities' Response:

### Investigator's Comments and Disposition:

Opinion noted and filed in Docket No. E-01933A-14-0248. closed

\*End of Comments\*

Date Completed: 10/31/2014

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